

EXHIBIT A

Ackerman Fox, LLP
 90 Merrick Ave., Suite 400
 East Meadow, NY 11554

Invoice submitted to:
 Mohammed Gangat
 675 3rd Ave., Suite 1810
 New York, NY 10017

November 26, 2019

In Reference To:
 Invoice #10322

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
	<u>Kamini Fox</u>		
10/24/2019	Review and respond to email from Gangat as to chapter 13 trustee's motion to dismiss.	0.17 300.00/hr	50.00
	Prepare and file notice of appearance on behalf of all 6 creditors.	0.33 300.00/hr	100.00
	Email to Gangat with copy of Notice of Appearance filed with court.	0.17 300.00/hr	50.00
	Review chapter 13 trustee's motion to dismiss bankruptcy case.	0.17 300.00/hr	50.00
	Telephone call to Carlos Segarra's bankruptcy attorney and left voicemail message.	0.17 300.00/hr	50.00
	Review notes from Gangat as to history and facts of case through judgment and fraudulent real property transfers, etc.	0.33 300.00/hr	100.00
10/26/2019	Review judgment obtained by Carolina Guerrero and prepare proof of claim.	0.50 300.00/hr	150.00
	Review documents and prepare proof of claim on behalf of Mohammed Gangat for attorney's fees and disbursements.	0.50 300.00/hr	150.00
	Review documents and prepare proof of claim on behalf of Eliana Galan.	0.50 300.00/hr	150.00

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	<u>Hrs/Rate</u>	<u>Amount</u>
10/26/2019 Review documents and prepare proof of claim on behalf of Elsa Mayor.	0.50 300.00/hr	150.00
Review documents and prepare proof of claim on behalf of Gladys Garcia.	0.50 300.00/hr	150.00
Review documents and prepare proof of claim on behalf of Luz Trejos.	0.50 300.00/hr	150.00
Email to Gangat requesting supporting documents for all 6 proofs of claims.	0.17 300.00/hr	50.00
10/27/2019 Review email from Gangat with documents to support proofs of claims.	0.17 300.00/hr	50.00
10/31/2019 Email to Gangat checking on status of his review of proofs of claims and status of my preparing Rule 2004 motion and objection to confirmation.	0.17 300.00/hr	50.00
11/6/2019 Email to Gangat requesting supporting documents for Mayor, Trejos, Garcia proof of claims.	0.17 300.00/hr	50.00
11/11/2019 Finalized all 6 proofs of claim, prepare attachments with breakdown of interest, etc. for Mayor, Garcia, Trejos, and file with court.	1.17 300.00/hr	350.00
11/18/2019 Review objections to confirmation of plan filed by mortgagees Deutsche Bank and JPMorgan Chase as to basis for objections.	0.33 300.00/hr	100.00
Telephone conversation with chapter 13 trustee as to his motion to dismiss and his strategy.	0.17 300.00/hr	50.00
11/19/2019 Prepare objection to confirmation on behalf of Garcia, Trejos, Mayor, together with all exhibits and file with court.	3.67 300.00/hr	1,100.00
Prepare objection to confirmation on behalf of Galan, Guerrero and Gangat together with all exhibits and file with court.	1.83 300.00/hr	550.00
Telephone conversation with Gangat as to whether dismiss/convert and pros/cons for each and strategy.	0.17 300.00/hr	50.00
11/21/2019 Appearance at Brooklyn Courthouse for Confirmation Hearing.	2.50 300.00/hr	750.00
11/22/2019 Review and respond to email from Gangat as to results of confirmation hearing.	0.08 300.00/hr	25.00
SUBTOTAL:	[14.94	4,475.00]

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	<u>Hrs/Rate</u>	<u>Amount</u>
<u>Neil H. Ackerman</u>		
11/19/2019 confs with KF re objections to confirmation and subsections of law that are applicable to each, edit draft objections prepared by KF	0.75 300.00/hr	225.00
SUBTOTAL:	[0.75	225.00]
For professional services rendered	15.69	\$4,700.00
Accounts receivable transactions		
10/22/2019 Payment to account by wire transfer: retainer		(\$2,500.00)
Total payments and adjustments		(\$2,500.00)
Balance due		\$2,200.00
Client funds transactions		
Previous balance of Default		\$0.00
10/22/2019 Payment to account by wire transfer: retainer		\$2,500.00
10/22/2019 Payment to account by wire transfer: retainer		(\$2,500.00)
New balance of Default		\$0.00